

1 DAVID N. BARRY, ESQ. (SBN 219230)  
2 THE BARRY LAW FIRM  
3 11845 W. Olympic Blvd., Suite 1270  
4 Los Angeles, CA 90064  
5 Telephone: 310.684.5859  
6 Facsimile: 310.862.4539

7 Attorney for Plaintiff, ARULSENTHILK SHANMUGAM and SUJAI  
8 SHANMUGAUNDRARAM

9 SOHEYL TAHSILDOOST, ESQ. (SBN 271294)  
10 MEHGAN GALLAGHER, ESQ. (SBN 338699)  
11 THETA LAW FIRM, LLP  
12 15901 Hawthorne Blvd., Suite 270  
13 Lawndale, CA 90260  
14 Telephone: (424) 297-3103  
15 Facsimile: (424) 286-2244

16 Attorneys for Defendant, MERCEDES-BENZ USA LLC

17 **UNITED STATES DISTRICT COURT**

18 **EASTERN DISTRICT OF CALIFORNIA**

19 ARULSENTHILK SHANMUGAM, an  
20 individual, SUJAI  
21 SHANMUGASUNDARAM, an  
22 individual,

23 Plaintiffs,

24 v.

25 MERCEDES-BENZ USA, LLC, A  
26 Delaware Limited Liability Company;  
27 and DOES 1 through 20, inclusive,  
28 Defendants.

Case No. 2:20-cv-01647-WBS (KJNx)

(Removed from Sacramento Superior  
Court – Case No. 34-2020-00278999-  
CU-BC-GDS)

**JOINT STIPULATION TO EXTEND  
TIME ON FILING FOR MOTION  
FOR ATTORNEY'S FEES, COSTS  
AND EXPENSES; ORDER**

Action Filed: May 18, 2020  
Trial Date: None

*Assigned for all purposes to*  
**THE HON. WILLIAM B. SHUBB**  
**Courtroom 2**

**JOINT STIPULATION TO EXTEND TIME FOR FILING FOR  
MOTION FOR ATTORNEY'S FEES, COSTS AND EXPENSES; ORDER**

**TO THE COURT:**

Plaintiffs Arulsenthilk Shanmugam and Sujai Shanmugasundarm and Defendant MERCEDES-BENZ USA LLC hereby stipulate to extend the time for filing Plaintiffs' Motion for Attorneys' Fees, Costs and Expenses and Bill of Costs.

WHEREAS, on February 3, 2022, the Court entered judgment on this matter and dismissed the case without prejudice;

WHEREAS, pursuant to Federal Rules of Civil Procedure, Rule 6(a)(1)(A), the parties are within the time period wherein they are allowed to extend, by written stipulation, the otherwise applicable deadlines for filing memorandum of costs and motions for attorneys fees;

WHEREAS, the parties have met and conferred and desire additional time to negotiate in good faith to attempt to resolve Plaintiffs' claims without further litigation;

THEREFORE, based on the foregoing facts, the parties hereby stipulate as follows:

1. The deadline to file and serve a bill of costs is 14 days from February 17, 2022 or by March 3, 2022.
2. The deadline to file and serve a motion for attorney's fees and costs is 14 days from March 3, 2022 or by March 17, 2022.

Date: February 3, 2022

THE BARRY LAW FIRM

By: /s/ David N. Barry

DAVID N. BARRY, ESQ.

Attorneys for Plaintiffs,  
ARULSENTHILK SHANMUGAM and  
SUJAI SHANMUGAUNDRARAM

THETA LAW FIRM, LLP

Dated: February \_\_, 2022

By: /s/\_\_\_\_\_

SOHEYL TAHSILDOOST, ESQ.  
MEHGAN GALLAGHER, ESQ.  
Attorneys for Defendant,  
MERCEDES-BENZ USA LLC

**ORDER**

Upon consideration of the Joint Stipulation of Plaintiff and Defendant to Extend Time for Filing Motion For Attorney's Fees, Costs and Expenses and good cause appearing therefore:


**IT IS ORDERED** that:

Plaintiffs' deadline to file a Bill of Costs is extended 14 days from February 17, 2022 to March 3, 2022

Plaintiffs' deadline to file a Motion for Attorneys Fees, Costs and Expenses is extended 14 days from March 3, 2022 to March 17, 2022.

**IT IS SO ORDERED.**

Dated: February 15, 2022

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE